

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

IN RE:	)	
	)	
JENNIFER LYNN HAININ	)	Case No. 13-11038-RGM
	)	Chapter 7
	)	
-----	)	
STEVEN PACKARD	)	
	)	
and	)	
	)	
MARIE PACKARD	)	
	)	
Movants	)	
	)	
v.	)	
	)	
JENNIFER LYNN HAININ	)	
	)	
Respondent	)	

**RESPONSE TO MOTION TO FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW Jennifer Lynn Hainin, by counsel, and responds to the Plaintiff's Motion for Relief as follows:

- 1) It is the Debtor's intention to vacate the property in question on or before June 30, 2013.
- 2) The Debtor's lease with the Movants was rejected on Schedule G of her bankruptcy schedules.

/s/ Michael J. O. Sandler  
Counsel for Jennifer Lynn Hainin

THE LAW OFFICES OF MICHAEL J. O. SANDLER, PLLC

/s/ Michael J. O. Sandler  
Michael J. O. Sandler, VSB #46443  
12781 Darby Brooke Court, Suite 201  
Woodbridge, Virginia 22192  
(703) 967-3315  
Counsel for Jennifer Lynn Hainin

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was sent electronically this 18<sup>th</sup> day June, 2013, to the following:

Kevin R. McCarthy, Trustee  
1751 Pinnacle Drive, Suite 1115  
McLean, VA 22102

Martin J. A. Yeager  
Land, Carroll & Blair, P.C.  
524 King Street  
Alexandria, Virginia 22314

/s/ Michael J. O. Sandler  
Michael J. O. Sandler